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Attorneys for Defendant Barrick Gold of North America, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CASE NO. 3:13-cv-00653-RCJ-VPC

MARIANNE EARDLEY as Trustee of the
Bankruptcy Estate of MICHAEL GOLDEN,

Plaintiff,

v.

BARRICK GOLD OF NORTH AMERICA,
INC., a foreign corporation,

Defendant.

**STIPULATED MOTION AND ORDER
STAYING CASE PENDING
BANKRUPTCY APPROVAL OF THE
SETTLEMENT**

Plaintiff Marianne Eardley as Trustee of the Bankruptcy Estate of Michael Golden (the "Trustee"), and Defendant Barrick Gold of North of America, Inc. ("Barrick") (collectively the "Parties"), by and through their attorneys of record, hereby stipulate and agree, as follows:

1 WHEREAS, a settlement agreement resolving the issues arising in this case was executed
2 by the Parties on March 16, 2015 (the "Settlement Agreement");

3 WHEREAS, the Trustee must seek approval of the Settlement Agreement from the
4 bankruptcy court; and

5
6 WHEREAS, the Parties wish to stay this action pending approval of the Settlement
7 Agreement by the bankruptcy court in an effort to avoid unnecessarily expending the resources
8 of the Parties and the Court, and in the interests of judicial economy,

9 IT IS HEREBY STIPULATED AND AGREED, by and between the Trustee and Barrick
10 and subject to Court approval, as follows:

11 1. The proceedings shall be stayed pending approval of the settlement agreement by
12 the bankruptcy court, and all current deadlines and schedules are hereby stricken.

13
14 2. The Parties shall file a Joint Status Report every sixty (60) days with the Court
15 that provides the Court with an up-to-date status and outcome of the above-referenced motion for
16 approval with the bankruptcy court.

17 3. The Parties shall promptly notify the Court of the outcome of the motion to
18 approve the Settlement Agreement with the bankruptcy court.

19 4. In the event the bankruptcy court does not approve the settlement and the case
20 must proceed forward, the Parties shall meet and confer and supply the Court with a proposed
21 amended Scheduling Order.
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IT IS SO STIPULATED

DATED this 19th day of March, 2015.

CAVANAUGH-BILL LAW OFFICES,
LLC

By: /s/ Julie Cavanaugh-Bill
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Attorneys for Plaintiff

DATED this 19th day of March, 2015.

MANNING CURTIS BRADSHAW
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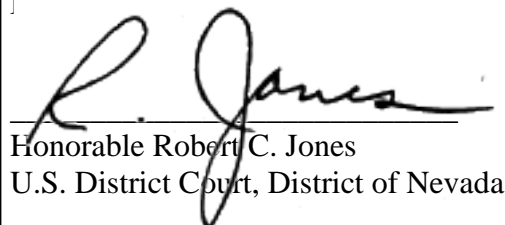
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*Attorneys for Defendant
Barrick Gold of North America, Inc.*

IT IS SO ORDERED.

Dated this 27th day of April, 2015.


Honorable Robert C. Jones
U.S. District Court, District of Nevada

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b) I certify that on the 19th day of March 2015, a true and correct copy of STIPULATED MOTION AND ORDER STAYING CASE PENDING BANKRUPTCY APPROVAL OF THE SETTLEMENT was transmitted via ECF, to the following:

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